

## **EXHIBIT B**

**SAPIRO & GOTTLIEB**  
ATTORNEYS AT LAW  
ONE AUER COURT  
EAST BRUNSWICK, N.J. 08816  
(732) 613-8000  
ATTORNEYS FOR PLAINTIFFS

**PLAINTIFFS**

NORMAN MOORE individually and on  
Behalf of A.C.T. INTERNATIONAL  
APPAREL GROUP INC., a New Jersey  
Corporation

vs.

**DEFENDANTS**

SHA LI and LAUREN JIA TAN  
(a/k/a LAUREN TAN) and LINGERIE  
INTERNATIONAL CO., LTD.

: SUPERIOR COURT OF NEW JERSEY  
: LAW DIVISION  
: MIDDLESEX COUNTY  
:  
: DOCKET NO. L-2808-07  
:  
: CIVIL ACTION  
:  
: SUMMONS  
:  
:  
:

**From the State of New Jersey**  
**To the Defendant(s) named above: SHA LI**

The Plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The Complaint attached to this Summons states the basis for this lawsuit. If you dispute this Complaint, you or your attorney must file a written Answer or Motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this Summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the Complaint is one in foreclosure, then you must file your written Answer or Motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, CN-971, Trenton, New Jersey 08625. A filing fee\* payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your Answer or Motion when it is filed. You must also send a copy of your Answer or Motion to Plaintiff's attorney whose name and address appear above, or to Plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written Answer or Motion (with fee and completed Case Information Statement) if you want the Court to hear your defense.

If you do not file and serve a written Answer or Motion within 35 days, the Court may enter a judgment against you for the relief Plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

4-166

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

Dated: May 8, 2007

/s/ DONALD F. PHELAN  
DONALD F. PHELAN  
Clerk of the Superior Court



Name of Defendant to be served: SHA LI  
Address for Service: A.C.T. INTERNATIONAL APPAREL GROUP INC.  
180 MADISON AVENUE, 20<sup>TH</sup> FLOOR  
NEW YORK, NEW YORK 10016

\* \$105.00 OR CHANCERY DIVISION CASES OR \$110.00 FOR LAW DIVISION  
CASES

## DEPUTY CLERKS ADDRESSES

Atlantic County, 1201 Bacharach Boulevard, Atlantic City, N.J. 08330  
 Bergen County, Justice Center, 10 Main Street, Hackensack, N.J. 07601  
 Burlington County Courts Facility, 49 Rancocas Road, Mt. Holly, N.J. 08060  
 Camden County Hall of Justice, 101 S. 5<sup>th</sup> Street, Camden, N.J. 08103-4001  
 Cape May County Courthouse, Main Street Cape, May Courthouse, N.J. 08210  
 Cumberland County Court House, Broad & Fayette Street, Bridgeton, N.J. 08302  
 Essex County Courts Building, 50 W. Market Street, Newark, N.J. 07102  
 Gloucester County Court House, 1 N. Broad Street, Woodbury, N.J. 08096  
 Hudson County Administration Building, 595 Newark Avenue, Jersey City, N.J. 07306  
 Hunterdon County Court House, Main Street, Flemington, N.J. 08822  
 Mercer County Court House, P.O. Box 8068, Trenton, N.J. 08650-0068  
 Middlesex County Court House, 1 Kennedy Square, New Brunswick, N.J. 08903  
 Monmouth County Court House, 71 Monument Park, Freehold, N.J. 07728  
 Morris County Court House, P.O. Box 900, Morristown, N.J. 07963-0900  
 Ocean County Court House, 118 Washington Street, Toms River, N.J. 08754  
 Passaic County Court House, 77 Hamilton Street, Paterson, N.J. 07505-2017  
 Salem County Court House, 92 Market Street, Salem, N.J. 08079  
 Somerset County Court House, P.O. Box 3000, Somerville, N.J. 08876-1262  
 Sussex County Court House, 43-47 High Street, Newton, N.J. 07860  
 Union County Court House, 2 Broad Street, Elizabeth, N.J. 07207  
 Warren County Courthouse, 2<sup>nd</sup> & Hardwick Street, Belvidere, N.J. 07823

|                   | <u>LEGAL AID OFFICES</u> | <u>LEGAL SERVICES OFFICES</u> |
|-------------------|--------------------------|-------------------------------|
| Atlantic County   | (609) 348-4200           | (609) 345-3444                |
| Bergen County     | (201) 487-2166           | (201) 488-0044 or 692-1011    |
| Burlington County | (609) 261-1088           | (609) 261-4862                |
| Camden County     | (609) 964-1002           | (609) 964-4520                |
| Cape May County   | (609) 465-3001           | (609) 463-0313                |
| Cumberland County | (609) 692-2400           | (609) 692-6207                |
| Essex County      | (201) 622-1513           | (201) 622-6207                |
| Gloucester County | (609) 848-5360           | (609) 848-4589                |
| Hudson County     | (201) 792-6363           | (201) 798-2727                |
| Hunterdon County  | (908) 782-7979           | (908) 735-2611                |
| Mercer County     | (609) 695-6249           | (609) 890-6200                |
| Middlesex County  | (732) 249-7600           | (732) 828-0053                |
| Monmouth County   | (732) 747-7400           | (732) 431-5544                |
| Morris County     | (201) 285-6911           | (201) 267-5882                |
| Ocean County      | (908) 341-2727           | (908) 240-3666                |
| Passaic County    | (201) 345-7171           | (201) 278-9223                |
| Salem County      | (609) 451-0003           | (609) 678-8363                |
| Somerset County   | (908) 231-0840           | (908) 685-2323                |
| Sussex County     | (201) 383-7400           | (201) 267-5882                |
| Union County      | (908) 527-4769           | (908) 353-4715                |
| Warren County     | (908) 475-2010           | (908) 267-5882                |

| CIVIL CASE INFORMATION STATEMENT<br>(CIS)   |   | FOR USE BY CLERK'S OFFICE ONLY   |  |
|---|---|--|--|
|  <p>Use for Initial Law Division<br/>Civil Part pleadings (not motions) under Rule 4:5-1<br/>Pleading will be rejected for filing, under Rule 1:5-6(c),<br/>if information above the black bar is not completed or<br/>if attorney's signature is not affixed.</p> |   | PAYMENT TYPE: <input checked="" type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA |  |
|   |   | CHG/CK NO.:  |  |
|   |   | AMOUNT: <u>PAID &amp; RECEIVED #2</u>  |  |
|   |   | OVERPAYMENT: <u>PAID 12 A 12 12</u>  |  |
| BATCH NUMBER: <u>12</u>   |   |  |  |
| ATTORNEY/PRO SE NAME<br><u>David Sapiro, Esq.</u>   | TELEPHONE NUMBER<br><u>732 613-8000</u>   | COUNTY OF VENUE: <u>Middlesex</u> OFFICE: <u>ESSEX COUNTY</u>  |  |
| FIRM NAME (if applicable)<br><u>Sapiro &amp; Gottlieb</u>   |   | DOCKET NUMBER (When available)<br><u>L-2808-07</u>   |  |
| OFFICE ADDRESS<br><u>One Auer Court<br/>East Brunswick, N.J. 08816</u>  |   | DOCUMENT TYPE<br><u>Verified Complaint</u>   |  |
|   |   | JURY DEMAND <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO                              |  |
| NAME OF PARTY (e.g., John Doe, Plaintiff)<br><u>Norman Moore, et al.</u>  | CAPTION<br><u>Norman Moore, individually and on behalf of<br/>A.C.T. International Apparel Group Inc., a<br/>New Jersey Corporation</u>   |  |  |
| CASE TYPE NUMBER<br>(See reverse side for listing)<br><u>599</u>  | IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO  |  |  |
| IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53A-27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.  |   |  |  |
| RELATED CASES PENDING?<br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO   | IF YES, LIST DOCKET NUMBERS   |  |  |
| DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO   | NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY, IF KNOWN<br><input type="checkbox"/> NONE <input checked="" type="checkbox"/> UNKNOWN  |  |  |
| <b>THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.</b>  |   |  |  |
| CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION   |   |  |  |
| DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO  | IF YES, IS THAT RELATIONSHIP <input type="checkbox"/> EMPLOYER-EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain)<br><input type="checkbox"/> FAMILIAL <input checked="" type="checkbox"/> BUSINESS |  |  |
| DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO   |   |  |  |
| USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION:  |   |  |  |
|   |   |  |  |
| DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO   |   | IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION:   |  |
| WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO  |   | IF YES, FOR WHAT LANGUAGE:   |  |
| ATTORNEY SIGNATURE<br>   |   |  |  |

**SAPIRO & GOTTLIEB**  
ATTORNEYS AT LAW  
ONE AUER COURT  
EAST BRUNSWICK, N.J. 08816  
(732) 613-8000  
ATTORNEYS FOR PLAINTIFFS

FILED & RECEIVED #2  
2007 MAR 12 A 10:41  
CIVIL  
MIDDLESEX COUNTY OFFICE

**PLAINTIFFS**

NORMAN MOORE Individually and on  
behalf of A.C.T. INTERNATIONAL  
APPAREL GROUP INC., a New Jersey  
Corporation

vs.

**DEFENDANTS**

SHA LI, LAUREN JIA TAN  
(a/k/a LAUREN TAN) and LINGERIE  
INTERNATIONAL CO., LTD.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
MIDDLESEX COUNTY  
DOCKET NO. L-2808-07  
CIVIL ACTION  
VERIFIED COMPLAINT

Plaintiff, Norman Moore residing at 1714 Barclay Boulevard, Princeton, New Jersey by way of Complaint against the Defendants above says:

**FACTS COMMON TO ALL COUNTS**

1. On or about November 22, 1994 A.C.T. International Apparel Group Inc. (hereinafter referred to as the "Corporation") filed a Certificate of Incorporation with the State of New Jersey.
2. At all relevant times herein, Plaintiff Norman Moore and Defendant Sha Li have each been owners of fifty percent of the capital stock of the Corporation.
3. The Corporation has been in the business of importing lingerie from China and selling the same to retailers in the United States.
4. Prior to August of 2005, the Corporation availed itself of the services of Dalian Associates in China as the export company to obtain merchandise

from the manufacturer and arrange to ship the same to the United States:

5. On or about August 2005, the Corporation switched export companies. The Corporation stopped doing business with Dalian Associates and began using Defendant Lingerie International Co., Ltd. hereinafter referred to as "Lingerie" to act as the export company for the Corporation. Defendant Lingerie is owned and operated by Defendant Sha Li's sister Lina.
6. Defendant Lingerie had an agreement with the Corporation to charge the corporation the actual cost of the merchandise. In contravention of this agreement, Defendant Lingerie overcharged the Corporation for the merchandise which had purchased.
7. Defendant Lingerie had an agreement with the Corporation to charge the Corporation the actual cost of freight. In contravention of this agreement, Defendant Lingerie overcharged the Corporation for freight.
8. Defendant Lingerie had an agreement with the Corporation to pay the Corporation a percentage of rebates received by Defendant Lingerie from the Government of China. In contravention of this agreement, Defendant Lingerie failed to pay any of said rebates to Corporation.
9. As a result of the foregoing, the Corporation encountered cash flow problems.
10. On December 1, 2006 the Defendant Sha Li called the Plaintiff Norman Moore and told him that unless a \$60,000.00 payment was made to Defendant Lingerie, merchandise which was in the possession of Defendant Lingerie and manufactured for Lane Bryant, a customer of the Corporation would not be shipped.
11. The Corporation employed the Defendant Lauren Jia Tan (a/k/a Lauren

Tan). The said Defendant is the niece of the Defendant Sha Li and the daughter of Defendant's sister Lina who owns and operates Defendant Lingerie in China.

12. On December 4, 2006 Plaintiff learned that Defendants Sha Li and Lauren Jia Tan (a/k/a Lauren Tan) had cleaned out their offices and left the Corporation without any warning.

13. On December 12, 2006 Defendant Sha Li's sister in China sent an email to Lane Bryant as attached hereto as Exhibit A.

14. Defendant Lingerie did not have the email address of Lane Bryant. That information was provided to Defendant Lingerie International by either or both of the Defendants Sha Li and Lauren Jia Tan (a/k/a Lauren Tan).

15. On December 12, 2006 an email was sent to customers of the Corporation. A copy of said email is attached hereto as Exhibit B. The email indicated that the said Defendant Lauren Jia Tan (a/k/a Lauren Tan) is now an employee of the Defendant Lingerie.

16. Defendant Lingerie conspired with Defendant Sha Li to cause the business of the Corporation to fail.

17. Defendant Lingerie entered into improper competition with the Corporation.

#### FIRST COUNT

1. Plaintiffs repeat all of the paragraphs of the Facts Common to All Counts.
2. The Defendant Sha Li conspired with her sister in China and with Defendant Lingerie and the said Defendants have breached their fiduciary duty to the Corporation.
3. The Defendant Sha Li has misused her position in the Corporation for private advantage.



4. The Defendants Sha Li and Lingerie have wrongfully conspired to damage the business of the Corporation.

WHEREFORE, Plaintiffs demand Judgment against the Defendants Sha Li and Lingerie for damages, compensatory and punitive together with counsel fees and costs.

#### SECOND COUNT

1. Plaintiffs repeat all of the paragraphs of the Facts Common To All Counts and the First Count herein.
2. The actions of the Defendant Sha Li are an intentional attempt on her part to acquire a corporate opportunity for her own private advantage.
3. Said Defendant Sha Li is attempting to cause the corporation to lose substantial business with the intention of taking over that business for herself.

WHEREFORE, Plaintiffs demand Judgment against the Defendant Sha Li for damages, compensatory and punitive together with counsel fees and costs.

#### THIRD COUNT

1. Plaintiffs repeat all of the paragraphs of the Facts Common To All Counts and the First and Second Counts herein.
2. The Defendant Sha Li has conspired to prevent the Corporation from going forward with its business.
3. The actions of the Defendant Sha Li are unreasonable and are a violation of her duties to the Corporation.

WHEREFORE, Plaintiffs demand Judgment against the Defendant Sha Li for damages, compensatory and punitive together with counsel fees and costs.

FOURTH COUNT

1. Plaintiffs repeat all of the paragraphs of the Facts Common To All Counts and the First, Second and Third Counts herein.
2. Defendant Sha Li and Lauren Jia Tan (a/k/a Lauren Tan) as employees of the Corporation owe the Corporation duty of loyalty.
3. The said Defendants have breached their duty of loyalty causing damage to the Corporation.

WHEREFORE, Plaintiffs demand Judgment against the Defendants Sha Li and Lauren Jia Tan (a/k/a Lauren Tan) for damages, compensatory and punitive together with counsel fees and costs.

FIFTH COUNT

1. Plaintiffs repeat all of the paragraphs of the Facts Common To All Counts and the First, Second, Third and Fourth Counts herein.
2. The Defendants Sha Li and Lauren Jia Tan (a/k/a Lauren Tan) by their actions have breached their trust obligations to the Corporation.
3. As a result of Defendants breach of trust, Plaintiff has sustained damages.

WHEREFORE, Plaintiffs demand Judgment against the Defendants Sha Li and Lauren Jia Tan (a/k/a Lauren Tan) for damages, compensatory and punitive together with counsel fees and costs.

SIXTH COUNT

1. Plaintiffs repeat all of the paragraphs of the Facts Common To All Counts and the First, Second, Third, Fourth and Fifth Counts herein.
2. Defendant Sha Li and Lauren Jia Tan (a/k/a Lauren Tan) had an obligation of good faith dealing in any dealings they had on behalf of the Corporation. The said Defendants have violated their duty to act in good

faith and as a result the Plaintiffs have been damaged.

3. The Defendant Lingerie has violated its duty to act in good faith and as a result the Plaintiffs have been damaged.

WHEREFORE, Plaintiffs demand Judgment against the Defendants Sha Li, Lauren Jia Tan (a/k/a Lauren Tan) and Lingerie for damages, compensatory and punitive together with counsel fees and costs.

#### SEVENTH COUNT

1. Plaintiffs repeat all of the paragraphs of the Facts Common to All Counts and the First, Second, Third, Fourth, Fifth and Sixth Counts herein.
2. Defendant Sha Li fraudulently induced the Corporation to switch exporters from Dalian Associates to Defendant Lingerie.
3. Defendant Sha Li and Defendant Lingerie have conspired to refuse to ship merchandise belonging to the Corporation to the United States in an effort to cause the Corporation substantial damage with the intent of taking over the Corporation's business and customers.
4. Plaintiffs have relied upon the fraud of the Defendants Sha Li and Lingerie to Plaintiffs damage.

WHEREFORE, Plaintiffs demand Judgment against the Defendants Sha Li and Lingerie for damages, compensatory and punitive together with counsel fees and costs.

#### EIGHTH COUNT

1. Plaintiffs repeat all of the paragraphs of the Facts Common To All Counts and the First, Second, Third, Fourth, Fifth, Sixth and Seventh Counts herein.
2. The actions of the Defendants Sha Li, Lauren Jia Tan (a/k/a Lauren tan)

and Lingerie are an attempt to maliciously interfere with contractual relationships of the Plaintiff.

3. As a direct and proximate result of the foregoing, the Corporation has sustained damages.

WHEREFORE, Plaintiffs demand Judgment against the Defendants Sha Li, Lauren Jia Tan (a/k/a Lauren Tan) and Lingerie for:

- a. Damages, compensatory and punitive together with counsel fees and costs.
- b. Enjoining the Defendant Sha Li and Lauren Jia Tan (a/k/a Lauren Tan) from illegally competing with the Corporation;
- c. Enjoining the Defendant Sha Li and Lauren Jia Tan (a/k/a Lauren Tan) from making any negative comments either orally or in writing concerning the Corporation;
- d. Enjoining the said Defendants from having any contact with the Corporation's present customers.

#### NINTH COUNT

1. Plaintiffs repeat all of the paragraphs of the Facts Common To All Counts and the First, Second, Third, Fourth, Fifth, Sixth, Seventh and Eighth Counts herein.
2. In the course of their employment by the Corporation, both Defendants have been privy to confidential information and trade secrets of the Corporation. Defendants have threatened to disclose this confidential information and the trade secrets to their benefit and to the detriment of the Corporation.

WHEREFORE, Plaintiffs demand Judgment against the Defendants Sha Li and Lauren Jia Tan (a/k/a Lauren Tan) for;

a. Damages, compensatory and punitive together with counsel fees and costs.

b. Enjoining the Defendants from disclosing to any third party any confidential information or trade secrets belonging to the Corporation which came into their possession as an employee of the Corporation.

TENTH COUNT

1. Plaintiffs repeat all of the paragraphs of the Facts Common To All Counts and the First, Second, Third, Fourth, Fifth, Sixth, Seventh and Eighth Counts herein.

2. Defendant Lingerie has fraudulently overcharged the Corporation for the cost of the merchandise, has overcharged the Corporation for the cost of freight, and has failed to pay over to the Corporation's percentage of tax rebates received by the Defendant Lingerie from the Government of China.

WHEREFORE, Plaintiffs demand Judgment against the Defendant Lingerie for:

a. Damages, compensatory and punitive together with counsel fees and costs.

ELEVENTH COUNT

1. Plaintiffs repeat all of the paragraphs of the Facts Common to All Counts and the First, Second, Third, Fourth, Fifth, Sixth, Seventh and Eighth Counts herein.

2. Defendants Sha Li and Lauren Jai Tan (a/k/a Lauren Tan) have unlawfully taken possession of property belonging to the Corporation to which they have no right of possession.

WHEREFORE, Plaintiffs demand Judgment against the Defendant Lingerie for:

a. Damages, compensatory and punitive together with counsel fees and costs.

- b. Directing the said Defendants to return any corporate property in their possession to the Corporation.

SAPIRO & GOTTLIEB  
Attorneys for Plaintiffs

Dated: March 9, 2007

By: 

DAVID SAPIRO

MAR 08, 2007 23:51 LOPEZ

0000-0110-0000

000-000-00000  
SAPING AND UTILIES

PAGE 01/01

I hereby certify that the statements contained in the foregoing Complaint are true. I further certify that I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: March 9, 2007

  
NORMAN MOORE

MAR 08, 2007 23:29

732 613 8006

page 1

**SAPIRO & GOTTLIEB**  
ATTORNEYS AT LAW  
ONE AUER COURT  
EAST BRUNSWICK, N.J. 08816  
(732) 613-8000  
ATTORNEYS FOR PLAINTIFFS

PLAINTIFFS

NORMAN MOORE individually and on  
behalf of A.C.T. INTERNATIONAL  
APPAREL GROUP INC., a New Jersey  
Corporation

VS.

DEFENDANTS

SHA LI, LAUREN JIA TAN  
(a/k/a LAUREN TAN) and LINGERIE  
INTERNATIONAL CO., LTD.

: SUPERIOR COURT OF NEW JERSEY  
: LAW DIVISION  
: MIDDLESEX COUNTY  
:  
: DOCKET NO.  
:  
: CIVIL ACTION  
:  
: CERTIFICATION OF FACSIMILE  
: SIGNATURE  
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:

I, DAVID SAPIRO, ESQ., of full age, hereby certifies according to law as follows:

1. I am an attorney for Sapiro & Gottlieb, Attorneys for the Plaintiffs in connection with the above entitled matter.
2. The Certification of Norman Moore annexed hereto is being filed with a facsimile of the original signature since Norman Moore was not available to sign the Certification.
3. Norman Moore acknowledged the genuineness of his signature to me on March 9, 2007, which document was sent via facsimile to him, executed by him and returned to me via facsimile.
4. The document or a copy with an original signature will be filed, if requested, by the Court or the Defendants.



I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

SAPIRO & GOTTLIEB  
Attorneys for Plaintiffs

By: 

DAVID SAPIRO

Dated: March 9, 2007

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TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (732) 981-3301  
COURT HOURS

DATE: MARCH 13, 2007  
RE: MOORE NORMAN VS LI SHA  
DOCKET: MID L -002808 07

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS  
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON BRYAN D. GARRUTO

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 001  
AT: (732) 981-3301.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A  
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.  
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE  
WITH R.4:5A-2.

ATTENTION:

ATT: DAVID SAPIRO  
SAPIRO & GOTTLIEB  
ONE AUER COURT  
EAST BRUNSWICK NJ 08816

JUMFREO

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
SHA LI,

Plaintiff,

-VS-

JUDGE CEDARBAUM

Index No.: 07cv4811

NORMAN MOORE, KARAN SINGH, and  
A.C.T. INTERNATIONAL APPAREL GROUP, INC.

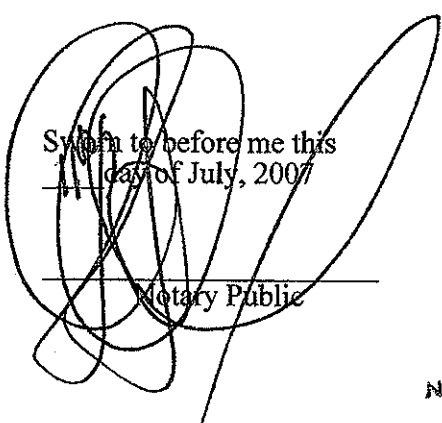
Defendants.  
-----X

**VERIFICATION**

NORMAN MOORE, being duly sworn, deposes and says:

I am an individual Defendant in the within action. I have read the foregoing documents entitled Verified Answer, Counterclaims and Cross Claims and know the contents thereof and the same is true to my own knowledge, except as to the matters therein stated to be alleged upon information and belief; and as to the matters I believe to be true.

  
\_\_\_\_\_  
NORMAN MOORE

  
Subscribed and sworn to before me this  
11 day of July, 2007

\_\_\_\_\_  
Notary Public

HARLAN M. LAZARUS  
Notary Public, State of New York  
No. 31-4723982  
Qualified in New York County  
Commission Expires February 28, 2011

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
SHA LI,

Plaintiff,

v.

NORMAN MOORE, KARAN SINGH, and A.C.T.  
INTERNATIONAL APPAREL GROUP, INC.,

Defendants.  
----- X

Judge Cedarbaum

Civil No. 07 CV 4811

**VERIFIED ANSWER, COUNTERCLAIMS  
AND CROSS CLAIMS OF NORMAN MOORE**

**LAZARUS & LAZARUS, P.C.**  
240 Madison Avenue, 8<sup>th</sup> Floor  
New York, New York 10016  
(212) 889-7400

To

Service of a copy of the within is hereby admitted.

Dated: \_\_\_\_\_

Attorney(s) for \_\_\_\_\_